

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:) Chapter 11
)
) Case No. 22-10584 (CTG)
FIRST GUARANTY MORTGAGE)
CORPORATION, *et al.*,¹) (Jointly Administered)
)
Debtors.) **Ref Docket No. 94**
)

**CERTIFICATION OF COUNSEL REGARDING DEBTORS' APPLICATION
FOR AUTHORIZATION TO EMPLOY AND RETAIN KURTZMAN CARSON
CONSULTANTS LLC AS ADMINISTRATIVE ADVISOR EFFECTIVE AS OF
THE PETITION DATE**

The undersigned hereby certifies that:

1. On July 7, 2022, the above-captioned debtors and debtors in possession (the “Debtors”) filed the *Debtors’ Application for Authorization to Employ and Retain Kurtzman Carson Consultants LLC as Administrative Advisor Effective as of the Petition Date* [Docket No. 94] (the “Application”) with the United States Bankruptcy Court for the District of Delaware (the “Bankruptcy Court”).

2. Pursuant to the notice of Application, responses were due to be filed on, or prior to, July 21, 2022, at 4:00 p.m. (ET) (the “Objection Deadline”). The Debtors granted an extension of the Objection Deadline to the Official Committee of Unsecured Creditors until July 25, 2022 at 4:00 p.m.

3. The Debtors received informal comments from the Office of the United States Trustee (the “UST”) to the Application. The undersigned certifies that the Bankruptcy

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number, are: First Guaranty Mortgage Corporation (9575); and Maverick II Holdings, LLC (5621). The Debtors' mailing address is 5400 Tennyson Parkway, Suite 450, Plano, TX 75024.

Court's docket has been reviewed in this case and no answer, objection or other responsive pleading to the Application appears thereon.

4. A revised form of order (the "Proposed Order") resolving the UST's comments is attached hereto as **Exhibit 1**. A blackline comparison of the Proposed Order against the form of order filed with the Application is attached hereto as **Exhibit 2**.

5. Accordingly, the Debtors respectfully request entry of the Proposed Order at the Bankruptcy Court's convenience.

Dated: July 26, 2022

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Laura Davis Jones

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Proposed Counsel for Debtors and Debtors in Possession